

## **REMARKS**

This paper is submitted in reply to the Final Office Action dated May 8, 2006, within the three-month period for response. In addition, as confirmed by the Interview Summary mailed May 22, 2006, it is Applicants' understanding that the finality of this Office Action has been withdrawn. Consideration of the amendments and remarks made herein, and allowance of all pending claims are therefore respectfully requested.

In the subject Office Action, claims 1-2, 4-18 and 20-24 were rejected under 35 U.S.C. § 103(a) as being unpatentable primarily over U.S. Patent No. 6,353,870 to Mills, U.S. Patent No. 6,633,916 to Kauffman, and MochaPocket TN5250 (MochaPocket).

Applicants respectfully traverse the Examiner's rejections to the extent that they are maintained. Applicants have amended claims 1, 14, 15, and 23 herein, and Applicants respectfully submit that no new matter is being added by the above amendments, as the amendments are fully supported in the specification, drawings and claims as originally filed.

Now turning to the subject Office Action, and specifically to the Examiner's rejection of independent claim 1, this claim generally recites a method of managing a logical partition on a logically-partitioned computer. The method includes connecting a handheld computer to an adapter on the logically-partitioned computer via a plug-in module coupled to the handheld computer and connected to the adapter via a cable, and configuring the handheld computer to emulate a console for a logical partition in the logically-partitioned computer using program code resident in the plug-in module.

Claim 1 has been amended to recite that configuring the handheld computer to emulate the console includes "automatically downloading the program code from the plug-in module to the handheld computer and initiating execution of the program code by the handheld computer in response to coupling the plug-in module to the handheld computer." Support for this amendment may be found, for example, at page 12, lines 19-25 of the Application as filed.

As such, claim 1 as amended now effectively requires that the program code be automatically downloaded to and executed by the handheld computer in response to coupling the plug-in module to the handheld computer.

Applicants can find no disclosure of this concept, in combination with the other features of claim 1, in any of the art cited by the Examiner, most notably Mills and the newly recited reference to Anderson. Mills merely discloses that executable code can be stored in a memory expansion card, and even that data files such as MP3 files can be downloaded from a card (*see, e.g.*, col. 7, line 65 to col. 8, line 14. Anderson, likewise, discloses only that a PCMCIA card can include executable code stored on a memory (*see, e.g.*, pp. 203-204).

Furthermore, it should be noted that Mills discloses that MP3 playback may be automatically started, at col. 8, lines 9-11. This auto-start feature, however, falls short of disclosing the functionality recited in claim 1. Specifically, the auto-start feature is triggered upon insertion of the "removable memory," which the Examiner will note, is not the insertion of the expansion card into the PDA, but is rather the insertion of the removable memory into the expansion card. In addition, the passage discussing this auto-start feature refers, if anything, to the automatic download of an MP3 file (*i.e.*, data), but speaks nothing of an automatic download and execution of executable code.

Accordingly, Applicants submit that the art cited by the Examiner does not disclose or suggest "automatically downloading . . . program code from the plug-in module to the handheld computer and initiating execution of the program code by the handheld computer in response to coupling the plug-in module to the handheld computer," as required by claim 1. The Examiner has therefore failed to establish a *prima facie* case of obviousness as to claim 1.

Applicant also asserts that the Examiner is continuing to rely on hindsight in combining the aforementioned references. The references cited by the Examiner fail to disclose or suggest a plug-in module capable of both connecting a handheld computer to an adapter on a logically-partitioned computer and storing program code configured to emulate a console for a logical partition in a logically-partitioned computer. Nor do the cited references disclose or suggest that a handheld computer may be configured to

emulate such a console using program code that is resident in a plug-in module coupled to the handheld computer.

Mills discloses a combination I/O and memory card. However, Mills does not disclose or suggest a combination I/O and memory card that is further adapted to store program code used to configure a handheld computer to emulate a console. Indeed, as Applicant has noted before, among the various embodiments disclosed in Mills at cols. 7 and 8, none of these embodiments disclose or suggest the storage of program code in the combination card that is used to access a remote computer over the I/O interface, much less to emulate a console.

Likewise, Kauffman discloses consoles resident in various logical partitions in a logically-partitioned computer (see, e.g., Fig. 2), as well as the ability for a PC, workstation, or local access terminal (LAT) to display console information (col. 7, lines 55-60). However, Kauffman does not disclose or suggest any form of plug-in module for any of these devices that includes program code used to configure such devices to emulate a console, much less a module that additionally provides a mechanism for interfacing with a remote computer.

MochaPocketTN5250 discloses program code for a handheld computer that can be used to emulate a console. However, the reference does not disclose or suggest that such program code may be resident in a plug-in module that additionally includes a mechanism for interfacing with a remote computer.

In short, none of the references disclose or suggest, alone or in combination, a plug-in module that includes program code capable of being used to enable a device coupled to the module to emulate a console over an interface that is also provided in the plug-in module. The fact that the prior art may disclose that program code can be stored in a plug-in module, and that program code may be used to emulate a console, still falls short of teaching that a plug-in module for a handheld computer may include program code that is specifically used to configure that handheld computer to emulate a console.

In addition, combining these features with the ability to automatically download the program code and initiate the execution of that program code on a handheld computer provides a unique and unexpected advantage in that a user is effectively able to quickly

and reliably configure a general purpose handheld computer to operate as a console merely through the simple steps of inserting a plug-in module into the handheld computer and coupling an appropriate cable to the plug-in module. The art of record does not appreciate the desirability of such a feature, and as a result, the claim is non-obvious over the prior art of record. Reconsideration and allowance of claim 1, and of claims 2, 4-14, and 24 which depend therefrom, are therefore respectfully requested.

Next, with respect to independent claims 14, 15 and 23, each of these claims has been amended in a similar manner to claim 1. In particular, each claim has been amended to recite that the program code is configured to be automatically downloaded to and executed by a handheld computer when the plug-in module is coupled to the handheld computer for the purpose of controlling the handheld computer to emulate a console. As discussed above in connection with claim 1, however, the combinations of references cited by the Examiner (Mills, Kauffman and MochaPocketTN5250 for claim 14, and Mills, MochaPocketTN5250, and Anderson for claims 15 and 23) do not disclose or suggest a plug-in module with the ability to automatically download program code to a handheld computer and then automatically initiate execution of that program code on the handheld computer in response to the plug-in module being coupled to the handheld computer. Furthermore, as Applicants have previously argued, none of these references disclose or suggest even a plug-in module that includes program code capable of being used to enable a device coupled to the module to emulate a console over an interface that is also provided in the plug-in module. The rejection continues to rely on hindsight, with Applicants' disclosure being used as a blueprint for rejecting the claims. The rejections of these claims are therefore defective and should be withdrawn. Reconsideration and allowance of claims 14-18 and 20-23, and of claims 16-22 which depend therefrom, are therefore respectfully requested.

Next, with respect to the dependent claims, Applicants note that a number of these claims recite additional subject matter for which the Examiner has not established a *prima facie* case of obviousness. For example, claim 10 additionally recites the steps of disconnecting a cable connected to a first adapter for a first logical partition and connecting the cable to a second adapter for a second logical partition to perform a

system administration operation on the second logical partition. In rejecting the claim, the Examiner essentially admits that Kauffman does not disclose this configuration, but takes Official Notice that it was old to disconnect a cable from one port and connect it to another for the purpose of enabling one console to interface with multiple partitions.

In taking Official Notice, however, the Examiner ignores the teachings of Kauffman that effectively teach away from Applicant's claimed configuration. In particular, col. 7, lines 55-60 disclose the use of a multiplexer 226 to enable a single workstation to interface with multiple partitions, and thus eliminate the need for "separate" workstations for each partition. Kauffman therefore eliminates the need for multiple workstations through a different mechanism (a multiplexer) than the configuration recited in claim 10. As such, since Kauffman discloses a different solution, one of ordinary skill in the art would not be motivated to modify Kauffman to utilize a single workstation that is connected and disconnected to and from different partitions via a single cable. *Prima facie* obviousness cannot be found based upon a proposed modification to a reference that clearly teaches away from making such a modification. Reconsideration and withdrawal of the rejection of claim 10 are therefore requested for this additional reason.

With respect to dependent claim 13, this claim additionally recites the concept of performing first and second system administration operations while a user is concurrently authenticated to first and second logical partitions. In rejecting the claim, the Examiner essentially admits that Kauffman does not disclose this configuration, but takes Official Notice that it was old to simultaneously authenticate a user with two separate logon sessions on a single computer using a single terminal (Office Action, ¶16.2).

The Examiner's statement as to Official Notice, however, does not address the fact that claim 13 is focused upon performing system administration operations on different logical partitions in the same computer while a user is concurrently authenticated to both logical partitions. Given that logical partitions operate in much the same manner as independent "virtual" computers, authenticating a user to two different logical partitions at the same time is conceptually very different from creating two sessions on the same computer. From the perspective of an external console such as is emulated on the

claimed handheld computer, logical partitions are more analogous to completely separate physical computers. Consequently, the Examiner's statement as to Official Notice, even if accepted on its face, still falls short of establishing a *prima facie* case of obviousness as to claim 13. Reconsideration and allowance of the claim are therefore respectfully requested.

Next, with respect to claim 22, this claim additionally recites the concept of using program code in a plug-in module to emulate first and second consoles that respectively communicate with first and second logical partitions in a logically-partitioned multi-user computer over first and second network interfaces in the plug-in module. As with claim 13, the Examiner relies on Official Notice for establishing the conventionality of simultaneously authenticating a user with two separate logon sessions on a single computer using a single terminal (Office Action, ¶21.4). As noted above in connection with claim 13, however, simultaneously authenticating a user to two different logical partitions is conceptually quite different from establishing two logon sessions on a computer, so the Examiner's reliance on Official Notice is insufficient to establish a *prima facie* case of obviousness.

Furthermore, Applicants note that the claim focuses on emulating two consoles that respectively communicate with two partitions via two network interfaces. Given that this claimed configuration enables a single handheld computer to interact concurrently with two separate and independent logical partitions within the same physical computer, Applicants submit that this combination of features presents a significant advantage over the prior art in terms of administering multiple logical partitions in a logically-partitioned computer. Reconsideration and allowance of claim 22 are therefore respectfully requested.

Finally, with respect to claim 24, as noted previously this claim recites the concept of authenticating a user with each of first and second logical partitions via an emulated console while first and second cables are coupled respectively between first and second adapters on the logically-partitioned computer and first and second interfaces in the plug-in module, such that the first and second system administration operations are performed while the user is concurrently authenticated to the first and second logical partitions. The

Examiner again relies on Official Notice; however, as discussed above in connection with claims 13 and 22, the Official Notice relied upon by the Examiner refers to concurrent logon sessions in a single computer, rather than concurrent sessions in two different logical partitions in the same computer.

Moreover, among the remaining art of record, most notably Laity, there is no disclosure or suggestion of concurrent authentication to two logical partitions, nor of coupling two interfaces in a plug-in module to two adapters allocated to first and second logical partitions in a logically-partitioned computer. Laity discloses a PCMCIA card with multiple network interfaces; however, there is no disclosure or suggestion in the reference of any capability of providing concurrent authentication to two logical partitions via those multiple network interfaces. Accordingly, Applicant submits claim 24 is non-obvious over the prior art of record.

In summary, Applicants respectfully submit that all pending claims are novel and non-obvious over the prior art of record. Reconsideration and allowance of all pending claims are therefore respectfully requested. If the Examiner has any questions regarding the foregoing, or which might otherwise further this case onto allowance, the Examiner may contact the undersigned at (513) 241-2324. Moreover, if any other charges or credits are necessary to complete this communication, please apply them to Deposit Account 23-3000.

Respectfully submitted,

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Date

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